

MEMO ENDORSED

Writer's Telephone: 214-785-6670  
 Writer's Email: jbragalone@bosfirm.com



BRAGALONE  
 OLEJKO  
 SAAD PC

September 9, 2024

**VIA FEDERAL EXPRESS**

The Honorable Louis L. Stanton  
 United States District Court for the Southern District of New York  
 500 Pearl Street, Room 2250  
 New York, NY 10007

USDC SDNY  
 DOCUMENT  
 ELECTRONICALLY FILED  
 DOC #:  
 DATE FILED: 9/13/24

Re: *United States ex rel. Foreman v. AECOM, et al.*, No. 1:16-cv-01960 (LLS) (S.D.N.Y.)

Dear Judge Stanton:

Pursuant to Paragraph 20 of the Court's Protective Order (Dkt. 63), Relator is submitting herewith unredacted copies of Relator's Letter Motion Requesting a Rule 37.2 Conference (Dkt. 192) and Exhibit B thereto. Relator seeks to seal portions of the Letter Motion that quote or paraphrase Defendants' Rule 30(b)(6) deposition transcript and Exhibit B, complete excerpts of Defendants' Rule 30(b)(6) deposition transcript. The basis for sealing these materials is set forth in Relator's Memorandum of Law in Support of Motion to File Under Seal (Dkt. 194).

In addition, Relator is enclosing courtesy copies of Relator's Letter Motion Requesting a Rule 37.2 Conference (Dkt. 192), Relator's Notice of Motion to File Under Seal (Dkt. 193), and Relator's Memorandum of Law in Support of Motion to File Under Seal (Dkt. 194).

Respectfully submitted,

Jeffrey R. Bragalone  
 Bragalone Olejko Saad PC  
 901 Main Street, Suite 3800  
 Dallas, Texas 75202  
 Tel: 214-785-6670  
 Fax: 214-785-6680  
 jbragalone@bosfirm.com

Sealing is denied for lack of  
 any showing of sufficient cause.  
 Designations of confidentiality in a  
 routine confidentiality stipulation  
 do not qualify. Louis L. Stanton  
 CC: Counsel of Record (by ECF)

Enclosures: Unredacted Versions of Relator's Letter Motion Requesting Rule 37.2 Conference (Dkt. 192) and Exhibit B thereto;

Relator's Letter Motion Requesting a Rule 37.2 Conference (Dkt. 192), Relator's Notice of Motion to File Under Seal (Dkt. 193), and Relator's Memorandum of Law in Support of Motion to File Under Seal (Dkt. 194)